## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN, MILWAUKEE DIVISION

JOHN COX, M.D. and SARAH	)	
DOBROZSI, M.D.,	)	Case No. 2:22-cv-00553-JPS
Plaintiffs,	)	
	)	Hon. J.P. Stadtmueller
v.	)	District Judge
	)	
THE MEDICAL COLLEGE OF	)	
WISCONSIN, et al.,	)	
	)	JURY TRIAL DEMANDED
Defendants.	)	

# JOINT MOTION TO DISMISS WITH PREJUDICE ALL CLAIMS AGAINST THE HOSPITAL DEFENDANTS

Plaintiffs John Cox, M.D. and Sarah Dobrozsi, M.D., and Defendants Children's Hospital and Health System, Inc., Children's Hospital of Wisconsin, Inc., Michael Gutzeit, M.D., Rita Ventura, A.P.N.P., The Medical College of Wisconsin, Inc., Hillary Petska, M.D., and Lynn Sheets, M.D., by their respective undersigned counsel, respectfully and jointly move to dismiss with prejudice all of Plaintiffs' claims against these Defendants, stating in support as follows:

- 1. As previously reported to the Court, *see* Dkt. 92, the Parties have reached an agreement to resolve the above-captioned case.
- 2. With respect to Plaintiffs' claims against Defendants Children's Hospital and Health System, Inc., Children's Hospital of Wisconsin, Inc., Michael Gutzeit, M.D., Rita Ventura, A.P.N.P., The Medical College of Wisconsin, Inc., Hillary Petska, M.D., and Lynn Sheets, M.D., (collectively, "Hospital Defendants"), the agreement to resolve these claims has been finalized.

- 3. Pursuant to Fed. R. Civ. P. 41(a)(2), Plaintiffs and the Hospital Defendants jointly move for an order dismissing all of Plaintiffs' claims against the Hospital Defendants, with prejudice and with each party to bear their own costs.
- 4. Plaintiffs' claims against the remaining Defendants (Defendants Demetra Parr-Nelson, Jessica Barber, Amy Scherbarth, Michelle Urban, M.D., Heather Miller, Rebecca Chagall, Stephanie Jewell, and Lorraine Hartmann) are subject to a separate agreement which is in the process of being finalized.

WHEREFORE, Plaintiffs and the Hospital Defendants respectfully request that the Court dismiss all of Plaintiffs' claims against the Hospital Defendants, with prejudice and with each party to bear their own costs.

#### Respectfully submitted,

#### s/ Sam Heppell

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### **CERTIFICATE OF SERVICE**

I, Sam Heppell, an attorney, hereby certify that on May 16, 2023, I caused the foregoing document to be filed via the Court's CM/ECF system, and thereby served a copy on all counsel of record.

/s/ Sam Heppell